

## UNITED STATES DISTRICT COURT

for the  
Middle District of North Carolina

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

Priority Mail package bearing tracking number 9505  
5107 2628 2080 3279 72, located at 3701 W. Wendover  
Avenue, Greensboro, NC 27495

Case No. 1:22MJ 145

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Priority Mail package bearing mailing label with tracking number 9505 5107 2628 2080 3279 72, located at 3701 W. Wendover Avenue, Greensboro, NC 27495,  
located in the Middle District of North Carolina, there is now concealed (identify the person or describe the property to be seized):

Controlled substances, packaging for controlled substances, and materials and documents reflecting the distribution of controlled substances through the U.S. Mail.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section  
21 U.S.C. § 841  
21 U.S.C. § 843(b)

Offense Description  
Distribution and Possession with Intent to Distribute a Controlled Substance  
Use of a Communication Facility to Facilitate Distribution of a Controlled Substance

The application is based on these facts:  
See attached Affidavit.

- ☒ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/S/ Jordan Wicks

Applicant's signature

Jordan Wicks, Postal Inspector

Printed name and title

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Application for a search warrant in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date:

03/24/22

Judge's signature

City and state: Greensboro, North Carolina

Hon. L. Patrick Auld, U.S. Magistrate Judge

Printed name and title

## AFFIDAVIT

The undersigned, being duly sworn, deposes and states:

1. I, Jordan Wicks, am a U.S. Postal Inspector and have been so employed since 2018. I am currently assigned to the Contraband Interdiction and Investigations Team in Greensboro, North Carolina and am responsible for the investigation of narcotics, drug trafficking organizations, and money laundering. I have received training by the USPIS, and members of the USPIS, in the investigation of controlled substances or proceeds/payments being transported through the United States. From 2014 to 2018, I was employed as a Special Agent with the United States Army Criminal Investigation Division (CID) as a supervisor in the Special Victims Unit. From 2008 to 2014, I was employed as a Detective with the Maplewood Police Department, St. Louis County, Missouri. From 2006 to 2008, I was employed as a Narcotics Detective with the Lincoln County Sheriff's Office, Missouri. From 2001 to 2005, I was a member of Security Forces in the United States Air Force. I have experience and advanced training pertaining to drug related investigations from the USPIS, Drug Enforcement Administration (DEA), U.S. Army, Midwest Counterdrug Training Academy, Missouri Narcotic Officers Association, the Multijurisdictional Counterdrug Task Force, as well as various other federal agencies and organizations.

2. On March 21, 2022, a Priority Mail parcel, bearing tracking number 9505 5107 2628 2080 3279 72 (hereafter, "the Subject Parcel") entered the mail stream in Phoenix, Arizona, 85009. The Subject Parcel was addressed to "Edward Bowden 420 center Baptist Church Rd Jackson Springs NC 2781 [sic] 27281."
3. On March 23, 2022, I conducted a review of the Subject Parcel at the USPS National Distribution Center in Greensboro, North Carolina. I noted the Subject Parcel was addressed from "Edward B." and addressed to "Edward Bowden," the package was heavily taped, found to be extremely dense, and I confirmed the mailer paid \$31.25 in cash to mail the Subject Parcel. It is commonly found that individuals trafficking drugs through the USPS will pay the postage in cash to evade law enforcement detection and identification.
4. The Subject Parcel is described as follows:
  - A. Addressed to: "Edward Bowden 420 center Baptist Church Rd Jackson Springs NC 2781 [sic] 27281"
  - B. From: "Edward B. 45673 w morningview LN Maricopa AZ"
  - C. Size: approximately 12" X 10" X 8"
  - D. Weight: approximately 5 pounds 5 ounces
  - E. Postage affixed: \$31.25
  - F. Physical description: a brown cardboard box, heavily taped,

handwritten addressee information, displaying tracking number 9505 5107 2628 2080 3279 72.

5. On March 23, 2022, I attempted to verify the information provided on the Subject Parcel for the recipient address by using law enforcement databases. I was able to determine that the recipient's address (420 Center Baptist Church Road, Jackson Springs, North Carolina 27281) for the Subject Parcel appeared to be a valid address, however, the name (Edward Bowden) is no longer associated with the recipient address listed on the Subject Parcel. Edward Bowden is sixty-eight years old and found to have previously associated with this address in or around 2018. From reviewing available law enforcement databases, including his North Carolina Driver's License, Edward Bowden now resides at a different address within Montgomery County, North Carolina, and no longer associates to 420 Center Baptist Church Road. In my training and experience in conducting drug trafficking investigations through the USPS, it is not uncommon for drug distributors to have a package containing drugs addressed in a person's name that previously associated with an address. This will limit the chance of law enforcement interdiction and seizure.
6. I also attempted to verify the information provided on the Subject Parcel for the return address by using law enforcement databases. I was able to determine that the return address (45673 West Morning View Lane,

Maricopa, Arizona 85139) for the Subject Parcel appeared to be a valid address. However, no one with the name of "Edward B," or any variation of this name, was found to be associated with the return address.

7. I am aware, through my training and experience, that people who utilize the U.S. Mail to distribute controlled substances and/or monetary payments related thereto commonly use fictitious names and addresses to attempt to avoid detection by law enforcement agencies. I am also aware that Arizona is a source state and that North Carolina is a known destination for controlled substances through the U.S. Mail.
8. I am aware, also through training and experience, that people often use the U.S. Mail, specifically Express, Priority Mail Express and Priority Mail, for the delivery of controlled substances and narcotics proceeds for various reasons, some of which are listed below:
  - A. Items sent via Express, Priority Mail Express, and Priority Mail are considered First-Class Mail. Therefore, these items cannot be examined without a federal search warrant.
  - B. Express, Priority Mail Express, and Priority Mail are generally expected to be delivered in one to three days. This assures the sender of expedited delivery.
  - C. Various dispatch times (times which a mailed item is transported to the next destination) are available to customers upon request and

provides the sender an opportunity to have some control as to the arrival of the mailed item.

- D. Individuals desiring to either send or receive controlled substances and payments for these substances through the U.S. Mail can do so without having to provide identification. This reduces the possibility of revealing their true identity.
- E. Individuals use the U.S. Mail to send payment, often large sums of currency, for the controlled substances they have purchased. It is common for the currency to come into contact with the narcotics during drug transactions. It is further common for the currency to pick up the odor of narcotics when they come into contact. The narcotic odor on currency typically dissipates after approximately one week.

#### **Information Regarding the Use of a Drug Detecting Canine**

- 8. On March 24, 2022, Drug K-9 Detective Justin Blanks of the Greensboro Police Department, and assigned to the Narcotics Division, was contacted regarding the Subject Parcel. Detective Blanks and drug detecting Canine Kona (hereafter, "Kona") responded to the Greensboro Network Distribution Center at 3701 W. Wendover Avenue, Greensboro, North Carolina in the Middle District of North Carolina, where the Subject Parcel is currently located.

9. The Subject Parcel was placed in a lineup with four other parcels at the Greensboro Network Distribution Center, none of which contained a controlled substance. Kona walked among the parcels. Kona alerted only to the Subject Parcel by sitting and staring at the Subject Parcel, which was Kona's signal to indicate the scent of a controlled substance. The examination took place at 9:05 a.m. on March 24, 2022.
10. Detective Justin Blanks has been a sworn law enforcement officer for the past twenty years with the Greensboro Police Department, having completed Basic Law Enforcement Training (BLET) in May 2001. Detective Blanks is currently assigned as an Investigative Interdiction Detective on the Vice Squad in the Vice & Narcotics Division of the Greensboro Police Department and has worked narcotics investigations, specifically, since January 2006. In January 2014, Detective Blanks was selected to be a Narcotics Detection Dog Handler and was assigned K-9 Peaches, a five-year-old Yellow Labrador Retriever (retired-November 2017). In December 2017, Detective Blanks was again selected to be a Narcotics Detection Dog Handler and assigned Kash, a German Shepard, a breed specifically selected for its keen senses and ability to be trained to detect the odor of controlled substances. In September 2019, Kash was retired from the Greensboro Police Department. In May of 2021, the Greensboro Police Department again selected Detective Blanks to be a Narcotics Detection



Dog Handler and was assigned Kona a German Shepard, a breed specifically selected for its keen senses and ability to be trained to detect the odor of controlled substances.

11. In addition to BLET, Detective Blanks has attended Police Law Institute, Street Crimes, Basic Narcotics Investigators course, Airport Narcotics Investigations, Introduction to Conspiracy Investigations, Highway and Rural Drug Investigations, Advanced Criminal Interdiction, Basic K-9/Detector Dog Training, High Risk Apprehensions, Bus Interdiction, Parcel Interdiction, Train Interdiction, and has attended numerous other seminars. Detective Blanks has been certified through the U.S. Drug Enforcement Administration's Operation JETWAY Training program to conduct all manner of Interdiction Investigations and has completed well over 500 hours of training with the majority of the training focusing on illegal narcotics throughout his career.

12. In addition to his current assignment, Detective Blanks has served the department as a Patrol Officer, Police Training Officer, and as a street-level drug officer. Detective Blanks is a member of the North Carolina Narcotics Enforcement Officers Association, the International Narcotics Interdiction Association (INIA), and the International Police Working Dog Association. In 2003, Detective Blanks was recognized by the Greensboro Police Officers Association as Officer to the Year and has received Officer of the month on



numerous occasions. In 2011, Detective Blanks' Investigative Interdiction Team was selected as the INIA International Interdiction Group of the Year.

13. Detective Blanks has conducted and assisted in numerous narcotics investigations leading to the arrest and conviction of narcotics traffickers in the State of North Carolina, 24th Prosecutorial District and the United States Federal Court of the Middle District of North Carolina.
14. In May 2021, Kona was purchased from Ventosa Kennels, in Scotland Neck, North Carolina, by the Greensboro Police Department. After undergoing several tests as to her suitability as a police work dog, Kona was accepted by the Canine Division and began training in May 2021. Kona and Detective Blanks have completed together over 200 hours of basic canine detection training with Detective Blanks as the canine handler and Sergeant W. M. Symmes, a trainer who has over 14 years of experience in the Canine Division of the Greensboro Police Department.
15. Kona has demonstrated that she can reliably use her olfactory senses to locate the odor of controlled substances, which include heroin, cocaine, crack cocaine, marihuana, hashish, methamphetamine, and 3,4-Methylenedioxymethamphetamine ("ecstasy"). After successful completion of this training, Kona entered into service with the Greensboro Police Department, Vice & Narcotics Division as a narcotics detection K-9.

16. In training with the Greensboro Police Department, Kona was “imprinted” to detect the odor of cocaine, crack cocaine, marihuana, hash, methamphetamine, heroin, and ecstasy. At the beginning of training, the officers placed all seven substances in a hidden box, and Kona was rewarded with a toy when she correctly alerted. Then, the officers removed one substance at a time, and repeated the testing, until Kona could detect the presence of any of the substances individually.

17. On August 17, 2021, Blanks took Kona to Fayetteville, North Carolina, to undergo testing by the International Police Working Dog Association. Joseph Salisbury, of the Cumberland County Sheriff’s Office, administered the tests. Kona underwent three tests. The first was an open-air field test where narcotic substances were hidden in four locations in a field or a parking lot. Kona successfully found the four hidden locations of controlled substances. The second test was of an interior room. Kona had to search five rooms, and alert to the presence of controlled substances. One of the rooms did not have any controlled substances and was blank. Kona successfully alerted to the four rooms that had controlled substances and did not alert to the blank room. The third test involved vehicles. Kona had to search eight school buses. Two of the buses had no drugs and were blank. Kona successfully alerted to the six buses that had controlled substances, and successfully did not alert on the two buses that were blank. Based on her

one hundred percent successful rate of testing, Kona received certification from the International Police Working Dog Association. This certification is valid for 15 months from the date of issuance.

18. Kona is trained to give a "Passive Alert" after detecting the odor of narcotics. This "Passive Alert" consists of a physical reaction that ultimately ends in the dog coming to a sitting position or alternating looks between Detective Blanks and the point of narcotics. Kona also exhibits various mental and physical reactions that are noticeable to Detective Blanks, which include changes in her behavior such as becoming possessive of the area, refusal to leave an area where the odor of narcotics is detected, and changes to her breathing rate and sniffing patterns.
19. Detective Blanks has successfully demonstrated the ability to properly deploy Kona and locate hidden narcotics. Kona has successfully detected narcotics that have been concealed in locations including the following: sealed packages, residential homes and outbuildings, automobiles, tractor-trailers, luggage, electrical components, and appliances, in the ground, and elsewhere.
20. On August 17, 2021, the K-9 detection team of Kona and Detective Blanks was certified as a K-9 detection team. From August 17, 2021 until November 12, 2021, Kona and Detective Blanks have located and seized no less than 111 pounds of methamphetamine, 17 pounds of marihuana and

\$265,230.00 in United States Currency (as of usage report dated November 12, 2021).


**Conclusion Regarding Probable Cause**

21. Based on the above facts, I have probable cause to believe that the Subject Parcel contains controlled substances, in violation of Title 21, United States Code, Sections 841 and 843(b). As such, I respectfully request that a Search Warrant be issued for the Subject Parcel.

Respectfully Submitted,

/S/ Jordan Wicks  
Jordan Wicks  
U.S. Postal Inspector

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means (telephone), was placed under oath, and attested to the contents of this written affidavit, on this 24th day of March, 2022.

  
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L. Patrick Auld  
United States Magistrate Judge  
Middle District of North Carolina